


**CRIMINAL COMPLAINT**  
(Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America v. <b>Carlitos Barriente</b> DOB: 2001; United States <b>Renato Chavez</b> DOB: 2000; United States	DOCKET NO.
	MAGISTRATE'S CASE NO. 21-04634MJ
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A) (ii), 1324(a)(1)(A)(v)(I), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii)	
<b>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</b> <b>COUNT 1 (Felony)</b> On or about September 19, 2021, in the District of Arizona, <b>Carlitos Barriente</b> and <b>Renato Chavez</b> , named herein as defendant and conspirator, did knowingly and intentionally combine, conspire, confederate, and agree with other persons, known and unknown, to transport certain illegal aliens, namely Sanjuana Martinez-Ramirez, Can Quan Ye, Marisol Martinez-Zavala, Maria Elena Gonzalez-Piedra, and Nimsi Domingo-Garcia, and did so for the purpose of private financial gain and placing in jeopardy the life of any person; in violation of <b>Title 8, United States Code, Sections 1324(a)(1)(A) (ii), 1324(a)(1)(A)(v)(I), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii)</b>	
<b>COUNT 2 (Felony)</b> On or about September 19, 2021, in the District of Arizona, <b>Carlitos Barriente</b> and <b>Renato Chavez</b> , knowing and in reckless disregard of the fact that certain illegal aliens, namely Sanjuana Martinez-Ramirez, Can Quan Ye, Marisol Martinez-Zavala, Maria Elena Gonzalez-Piedra, and Nimsi Domingo-Garcia, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain and placing in jeopardy the life of any person; in violation of <b>Title 8, United States Code, Sections 1324(a)(1)(A) (ii), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii)</b>	
<b>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</b> On or about September 19, 2021, in the District of Arizona (Patagonia), the Sonoita Border Patrol Station informed agents in the field that a 2021 Chevrolet Silverado with temporary license plate turned west on FSR-61 from the FSR-49 intersection. The same vehicle was previously seen traveling south towards the town of Lochiel which is located on the border with Mexico. The vehicle traveled back north a short time later, this behavior is consistent with subjects looking to pick up noncitizens and transport them north. An agent located the vehicle on FSR-49 and saw two visible occupants. The agent attempted to initiate a vehicle stop and the vehicle yielded briefly. The driver then sped off at a high rate of speed. Agents found the vehicle approximately 15 minutes later near the south entrance of the Hermosa Mine, the vehicle had drove off an embankment into a wash and rolled over. The agents found two adult females with injuries sitting near the vehicle. The driver and front passenger ran from the vehicle. The agents eventually arrested five subjects who admitted they were in the U.S. illegally and were identified as Sanjuana Martinez-Ramirez, Can Quan Ye, Marisol Martinez-Zavala, Maria Elena Gonzalez-Piedra, and Nimsi Domingo-Garcia. Agents tracking foot sign also located a United States Citizen, <b>Carlitos Barriente</b> , who was identified as a passenger and registered owner of the Silverado. <b>Barriente's</b> foot sign matched precisely the foot sign the agent was following from the accident scene.	
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MATERIAL WITNESSES IN RELATION TO THE CHARGE: Sanjuana Martinez-Ramirez, Can Quan Ye, Marisol Martinez-Zavala, Maria Elena Gonzalez-Piedra, and Nimsi Domingo-Garcia	
Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED BY: AUSA JAA/ri _____ <div style="text-align: right; font-size: small;">Digitally signed by JOSH ACKERMAN Date: 2021.09.21 09:53:27 -07'00'</div>	SIGNATURE OF COMPLAINANT <b>RICARDO ISLAVA</b> Digitally signed by RICARDO ISLAVA Date: 2021.09.21 09:48:26 -07'00' OFFICIAL TITLE Border Patrol Agent
Sworn by telephone <u>  x  </u>	
SIGNATURE OF MAGISTRATE JUDGE <sup>1)</sup> 	DATE September 21, 2021

<sup>1)</sup> See Federal rules of Criminal Procedure Rules 3, 4.1, and 54

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On September 20, 2021, an agent was driving eastbound on SR-82 near the Royal Roads Market. The agent saw two people walking westbound towards the market and noticed that both people had brush/grass on their clothing. One subject was identified as **Renato Chavez**, a U.S. Citizens. The second subject admitted he was in the U.S. illegally.

**Chavez** said that he had an unloaded pistol with him inside his bag which the agent secured. BPA identified **Chavez** as the driver of the Chevrolet which crashed the previous day.

In a post-*Miranda* statement, **Chavez** admitted being the driver of the Silverado during the smuggling attempt and crash. **Chavez** said that he and his friend **Barriente** came down to Lochiel Arizona on September 18, 2021 to pick up noncitizens, but they were called off by the coordinator. **Chavez** and **Barriente** returned on September 20 and picked up several Mexican Citizens and one Chinese National. **Chavez** said that he drove through the entire incident and crash. **Chavez** said that **Barriente** sat in the front passenger seat, two noncitizens were in the bed of the truck, and three in the backseat. After the truck crashed, **Chavez** said that he and **Barriente** crawled out of the back door. **Chavez** attempted to help the people trapped in the bed of the truck and **Chavez** had to pry and break off the corner of the tonneau cover off. **Chavez** said that a one person in the bed appeared to be injured and couldn't run away so he took off running with **Barriente**. **Chavez** said he was to be paid \$1,000 to \$1,200 per person and he would split the money with **Barriente**.

Records checks revealed that Sanjuana Martinez-Ramirez, Can Quan Ye, Marisol Martinez-Zavala, Maria Elena Gonzalez-Piedra, and Nimsi Domingo-Garcia did not have the proper immigration documentation to enter or remain in the U.S. legally. Martinez was previously removed from the U.S. on September 20, 2013.